

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 24-11745-AMC
Alison R. Hynds	:	Chapter 13
<i>Debtor</i>	:	
	:	
United Asset Management, LLC	:	
<i>Movant</i>	:	
vs.	:	
Alison R. Hynds	:	
<i>Debtor/Respondent</i>	:	
and	:	
Kenneth E. West, Esquire	:	
<i>Trustee/Respondent</i>	:	

**OBJECTION TO CONFIRMATION OF THE PLAN**

United Asset Management, LLC (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Alison R. Hynds (“Debtor”), as follows:

1. As of the bankruptcy filing date of May 22, 2024, Movant holds a secured Claim against the Debtor’s property located at 5981 Stump Road, Pipersville, PA 18947.
2. On June 21, 2024, Movant filed a Proof of Claim citiy a secured claim in the amount of \$166,012.45, and pre-petition arrears in the amount of \$23,028.32
3. The Plan currently proposes payment to Movant in the amount of \$19,531.03 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.
6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

**WHEREFORE**, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor’s Chaper 13 Plan.

Respectfully submitted,

Dated: 06/24/2024

/s/Danielle Boyle-Ebersole  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521/Fax 215-855-9121  
dboyle-ebersole@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:		: Bankruptcy No. 24-11745-AMC
Alison R. Hynds		: Chapter 13
<i>Debtor</i>		:
		:
United Asset Management, LLC		:
<i>Movant</i>		:
vs.		:
Alison R. Hynds		:
<i>Debtor/Respondent</i>		:
and		:
Kenneth E. West, Esquire		:
<i>Trustee/Respondent</i>		:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for United Asset Management, LLC (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 06/24/2024:

Jeffrey C. McCullough, Esquire  
Via Electronic Filing  
*Attorney for Debtor*

Kenneth E. West, Esquire  
Via Electronic Filing  
*Trustee*

Alison R. Hynds  
5981 Stump Road  
Pipersville, PA 18947  
Via First Class Mail  
*Debtor*

Respectfully Submitted,

Date: 06/24/2024

/s/Danielle Boyle-Ebersole  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521/Fax 215-855-9121  
dboyle-ebersole@hoflawgroup.com